

Comments of the Service Employees International Union on  
Draft Federal Greenhouse Gas Accounting and Reporting Guidance

For Executive Order on Federal Leadership in Environmental, Energy and Economic Performance

Submitted to the Council on Environmental Quality  
Attn: Leslie Gillespie-Marthaler  
722 Jackson Place, NW  
Washington, DC 20503

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On behalf of the 2.2 million members of the Service Employees International Union (SEIU), and, especially, on behalf of the thousands of SEIU members who clean, operate, and maintain commercial, multi-family, institutional, and public buildings nationwide, we wish to express our appreciation for the administration's draft guidance to federal agencies for measuring and reporting greenhouse gas (GHG) emissions. Accurate and timely measurement is the first step toward management of the GHGs that cause global warming. Federal leadership in this respect can establish a standard for the entire economy and so we are pleased that the administration proposes to take a comprehensive and rigorous approach to the challenge of measuring and reporting its own GHG emissions.

As a labor union that represents building service workers whose day to day work could be affected by the standards and practices adopted first by the federal government and, ultimately, across the economy, we respectfully offer these comments with the goal of ensuring those standards and practices set a high standard from the outset.

Our broad support for the reporting guidelines notwithstanding, we wish to point out one area in which the methods described could be strengthened. Of special concern, the proposed guidelines create a substantial reporting loophole by failing to require agencies to report emissions from buildings leased from private sector owners.

Instead, we urge that agencies be required to report all emissions from the space they lease from private sector owners, irrespective of whether the agency directly pays the energy bills. At a minimum, the guidelines should clearly set forth reporting requirements that should be incorporated when new lease agreements are signed and old leases are renewed. If public building managers have the technical capability to collect and report this data, then surely private building managers should have the same technical capabilities.

The reasons to require GHG reporting from privately owned building space leased by the federal government are two-fold. First, if the percentage of leased space grows in the federal building stock, failure to report emissions from these buildings could create a false and misleading impression of changes to GHG emissions by federal agencies. Second, in failing to require GHG reporting by private sector managers of leased buildings, the guidance document misses an opportunity to nudge commercial property managers toward monitoring, reporting, and managing their own GHG emissions.

The guidance document provides an inadequate rationale for creating a reporting loophole for property leased by federal agencies. Footnote 6 in the Draft Guidelines states that the Executive Order on Federal Leadership in Environmental, Energy and Economic Performance (EO 13514) does not hold private landlords responsible for reporting GHGs.

We view this interpretation of EO 13514 as misleading. While EO 13514 does not specifically require private sector property owners to report on GHG emissions from buildings leased by the federal government, it clearly requires GHG monitoring and reports from all “agency buildings” irrespective of whether they are owned by the government or leased by the government.

Further, EO 13154 mandates “advanced sustainable acquisition” such that “95 percent of new contract actions... for products and services... are energy efficient.....and environmentally preferable....” On its face, this language seems to offer ample grounds for writing energy or GHG reporting criteria into new or renewed property leases.

We welcome the statement in the Draft Guidelines that a federal GHG Accounting Workgroup will develop methods in the future by which federal tenants will report emissions. However, we are concerned that the guidelines neither provide a timeline for the working group nor guidance on writing GHG data collection and reporting into federal lease agreements.

## **Conclusion**

On the whole, the administration’s draft guidance on accounting and reporting greenhouse gas emissions represents a big step toward measuring and managing the federal government’s contribution to global warming. It sets a standard that could inform accounting and reporting requirements for the private sector as well as for state and local governments. While we greatly appreciate the important steps forward reflected in this guidance document, we urge that the final document close a significant loophole and provide a date certain and clear guidance by which reporting requirements for federally owned property will also apply to property leased by the federal government.